

APPENDIX E

List Of Trivial Activities

The List Of Trivial Activities is a list of most common trivial activities. The List Of Trivial Activities does not include every trivial activity and is to be used as a guide only.

Any other activity, that is not included in Appendix E (List Of Trivial Activities), that is not conducted as part of a manufacturing process, that is not related to the source's primary business activity, and that does not otherwise trigger a permit revision, may be considered a trivial activity, if approved by the Control Officer and the Administrator of EPA.

A Non-Title V source is not required to list nor to describe trivial activities in a permit application and is not required to include, in a permit application, the emissions from such trivial activities.

A Title V source is not required to list nor to describe trivial activities in a permit application and is not required to include, in a permit application, the emissions from such trivial activities.

General Combustion Activities:

1. Combustion emissions from propulsion of mobile sources.
2. Any natural gas and/or liquefied petroleum gas-fired piece of equipment that individually has an input capacity of less than 300,000 BTU/hour, if only emissions result from fuel burning.

Surface Coating And Printing Equipment:

1. Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit volatile organic compounds (VOC) and/or hazardous air pollutant(s) (HAPs).
2. Architectural and decorative surface coating applications.

Cleaning Equipment:

1. Equipment using water or water and soap (detergent) for purposes of cleaning or finishing.
2. Laundry activities, except for dry-cleaning, steam boilers, and dryers over 300,000 BTU/hour.

Internal Combustion Equipment:

1. Portable internal combustion (IC) engines used for groundskeeping, plant maintenance, and landscaping purposes.
2. Emergency (backup) electrical generators at residential locations.

Testing And Monitoring Equipment:

1. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
2. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis such as soil gas, groundwater, or stack sampling equipment.
3. Hydraulic and hydrostatic testing equipment.
4. Environmental chambers not using hazardous air pollutants (HAPs) nor emitting PM₁₀.
5. Shock chambers.
6. Humidity chambers.
7. Solar simulators.
8. Vents from continuous emissions monitors and other analyzers.

Office Equipment:

1. Non-ammonia air-conditioning units used for human comfort that do not have applicable requirements under Title VI of the Act.
2. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
3. Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.
4. Bathroom/toilet vent emissions.
5. Tobacco smoking rooms and areas.
6. Consumer use of paper trimmers/binders.
7. Servicing and use of office equipment, such as correction fluid, adhesives, printer and copier toner, blueprint machines, and paper shredding, by printers and businesses primarily involved in photographic reproduction.
8. Use of consumer products, including hazardous substances as that term is defined in the Federal Hazardous Substances Act (15 U.S.C. 261 et. seq.) where the product is used at a source in the same manner as normal consumer use.

Repair And Maintenance:

1. Janitorial services and consumer use of janitorial products.
2. Plant maintenance and upkeep activities (e.g., groundskeeping, general repairs, cleaning, painting, welding, brazing, soldering, plumbing, re-tarring roofs, installing insulation, and paving and sealing parking lots) provided these activities are not the source's primary business activity (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements).
3. Repair or maintenance shop activities not related to the source's primary business activity (excluding emissions from surface coating or degreasing activities) and not triggering a permit revision.
4. Housekeeping activities and associated products used for cleaning purposes, including collecting spilled and accumulated materials at the source, including operation of fixed vacuum cleaning systems specifically for such purposes.
5. Activities at a source associated with the maintenance, repair, or dismantlement of an emissions unit or other equipment installed at the source, including preparation for maintenance, repair, or dismantlement and preparation for subsequent startup, including preparation of a shut down vessel for entry, replacement of insulation, welding, and cutting, surface preparation, painting, and steam purging of a vessel prior to startup; also includes dismantlement of buildings, utility lines, pipelines, wells, excavations, earthworks, and other structures that do not constitute an emissions unit.

Storage And Distribution:

1. Storage tanks, vessels, containers holding or storing liquid substances that will not emit any VOC or HAPs.
2. Demineralized water tanks and demineralizer vents.
3. Boiler water storage operations not including cooling towers.
4. Storage and handling of drums or other transportable containers (i.e., containers of less than 25 gallons) where the containers are sealed during storage and transport (includes containers of hazardous waste and used oil).
5. Storage tanks of 10,000 gallons or less containing diesel fuel, lubricating oil, transformer oil, used oil, or other non-HAP organic liquids with a vapor pressure less than or equal to 1.5 psia.
6. Piping and storage systems for natural gas, propane, and liquefied petroleum gas.
7. Piping systems for diesel fuel and other fuel oils.
8. Surface impoundments such as ash ponds, cooling ponds, evaporation ponds, settling ponds, and holding ponds as long as there are only trace amounts of acids and/or solvents in the impoundments.
9. Lubricating and hydraulic system reservoirs and vents.

Hand Operated Equipment:

1. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
2. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
3. Portable electrical generators that can be moved by hand from one location to another ("Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized conveyance or device.)
4. Air compressors and pneumatically operated equipment including hand tools.

Food Equipment:

1. Non-commercial food preparation excluding boilers.

Water And Waste Water Treatment:

1. Process water filtration systems and demineralizers.
2. Production of hot/chilled water for on-site use not related to any industrial process excluding boilers.
3. Boiler water treatment.
4. Oxygen scavenging (de-aeration) of water.
5. Deionized (DI) water production for process water.

Emergency Equipment:

1. Fire suppression systems.
2. Flares used to indicate danger to the public (including emergency road flares).
3. Stormwater and fire sprinkler water holding areas.
4. Safety devices including fire extinguishers.

Roadways And Motor Vehicles:

1. Road and lot paving operations at commercial and industrial facilities (not including asphalt plants).
2. Street and parking lot striping.
3. General vehicle maintenance activities at the source.
4. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

Miscellaneous Activities:

1. Blacksmith forges.
2. Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of hazardous air pollutant (HAP) metals.
3. Batteries and battery charging stations, except at battery manufacturing plants.
4. Storage tanks, reservoirs, and pumping and handling equipment, of any size, used to mix and package soaps, detergents, waxes, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized and no heat is applied.
5. Drop hammers or hydraulic presses for forging or metalworking.
6. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
7. CO₂ lasers, used only on metals and other materials which do not emit HAP in the process.
8. Electric or steam-heated drying ovens and autoclaves but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
9. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.
10. Laser trimmers using dust collection to prevent fugitive emissions.

11. Ozone generators of up to 1,000 pounds per day if equipped with a destruction unit that does not emit more than 1 ppm in the exhaust stream.
12. Steam vents and safety relief valves.
13. Steam leaks.
14. Steam cleaning operations.
15. Steam sterilizers.
16. Petroleum contaminated soil remediation projects as long as the product has a vapor pressure less than 1.5 psia and no artificial heat is applied.
17. Transformer vents.
18. Adhesive use which is not related to production.
19. Electric motors.
20. UV and corona discharge-type equipment.
21. Cathodic protection systems.
22. High voltage induced corona.
23. Replacement and draining of filters (unless otherwise regulated).
24. Garbage handling including processing of recyclable materials, bailing, and compacting.
25. Station transformers.
26. Circuit breakers.
27. Acid, solvent, and other chemical storage.
28. Vacuum pumps.
29. House vacuum and air compressors (electrical only).
30. Health services activities (first aid, nursing, and medical) including activities directly used in the diagnosis and treatment of disease, injury, or other medical condition excluding ETO sterilizers.
31. Individual flanges, valves, pump seals and pressure relief valves, and other individual components that have the potential for leaks unless subject to a NESHAPs.
32. Venting of compressed natural gas, butane, or propane gas cylinders with a capacity of 1 gallon or less.
33. Unheated containers, reservoirs, or tanks used exclusively in dipping operations to coat objects with oils, waxes, or greases, provided no organic solvent has been mixed with such materials.
34. Any other activity, as approved by the Control Officer and the Administrator of EPA, that is not conducted as part of a manufacturing process, is not related to the source's primary business activity, and does not otherwise trigger a permit revision.